

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN SECTION OF  
TENNESSEE AT KNOXVILLE**

JOHN DOE,

Plaintiff,

v.

Civil Action No.: 3:20-cv-154

BIC VENTURES, LLC dba  
SEASONS INNOVATIVE BAR & GRILL,

JURY DEMANDED

Defendant.

PLAINTIFF'S RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE.

Comes the Plaintiff, by and through under-signed counsel, and would respond to this Court's Order to Show Cause as to why the Complaint herein should not be dismissed without prejudice for failure to serve Defendant within 90 days of the filing of the Complaint. For good cause shown as to why the Show Cause should be dismissed in all respects, Plaintiff would state the following:

1. Defendant herein was served by way of certified mail on May 5, 2020. See Doc # 8.
2. Defendant's filing with the Tennessee Secretary of State does not list a specified registered agent but merely lists the name of the limited liability company as the registered agent. See Exhibit A.
3. The Defendant was served at the address listed for the registered agent as Doc # 8 reflects. Also see Exhibit A.
4. Defendant clearly was served and has personal knowledge of this lawsuit. See Collective Exhibit B.

WHEREFORE, PREMISES CONSIDERED, PLAINTIFF PRAYS THAT THIS COURT'S ORDER TO SHOW CAUSE BE DISMISSED IN ALL RESPECTS.

Respectfully submitted,

s/Darren V. Berg  
Darren V. Berg  
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s/Russ Egli  
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ECF CERTIFICATE OF SERVICE

I, the under-signed counsel, certify that a copy of this Response has been sent through the Court's ECF filing to counsel for the Defendant who has now made an appearance in this case.

This the 21<sup>st</sup> day of July, 2020.

s/Russ Egli  
Russ Egli  
Co-Counsel for the Plaintiff